

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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**In re**

**LEHMAN BROTHERS HOLDINGS INC., et al.,  
Debtors.**

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**Chapter 11  
Case No. 08-13555 (JMP)  
(Jointly Administered)**

**FIRST SUPPLEMENTAL AFFIDAVIT OF ROBERT M. KEANE, JR.  
IN CONNECTION WITH PAUL HASTINGS' RETENTION AS SPECIAL COUNSEL  
TO THE DEBTORS**

STATE OF CALIFORNIA            )  
                                          ) ss :  
COUNTY OF LOS ANGELES        )

Robert M. Keane, Jr., being duly sworn, upon his oath, deposes and says:

1. I am a partner in the law firm of Paul, Hastings, Janofsky & Walker LLP ("Paul Hastings" or the "Firm"), with offices in several locations, including an office located at 515 South Flower Street, 25th Floor, Los Angeles, California 90071.

2. The facts set forth below are based upon my personal knowledge, discussions with other Paul Hastings attorneys, and the Firm's client/matter records reviewed by me or other Paul Hastings attorneys acting under my supervision and direction. Paul Hastings currently employs hundreds of lawyers. To the extent any information disclosed herein requires amendment or modification upon Paul Hastings' completion of further review or as additional information becomes available to it, a supplemental affidavit will be submitted to the Court reflecting such amended or modified information.

3. From the date Lehman Brothers Holdings Inc. ("LBHI") and its affiliated debtors and debtors-in-possession (collectively, the "Debtors") commenced their respective chapter 11 cases through February 28, 2010, Paul Hastings served as an ordinary course professional in these cases. On December 29, 2008, the Firm submitted the "Affidavit of Ordinary Course Professional" (the "Initial Affidavit") [Docket No. 2407]. Capitalized terms used but not defined herein have the meaning given in the Initial Affidavit.

4. On May 21, 2009, the Firm submitted the "First Supplemental Affidavit and Disclosure Statement Pursuant to the Order Authorizing the Debtors to Employ Professionals Utilized in the Ordinary Course of Business" [Docket No. 3631]. On September 14, 2009, the Firm submitted the "Second Supplemental Affidavit and Disclosure Statement Pursuant to the Order Authorizing the Debtors to Employ Professionals Utilized in the Ordinary Course of Business" [Docket No. 5133]. The Initial Affidavit, the first supplemental affidavit, and the second supplemental affidavit are collectively referred to herein as the "OCP Affidavits".

5. On July 23, 2010, the Debtors submitted an application under Bankruptcy Code section 327(e) for authorization to employ Paul Hastings as special counsel, *nunc pro tunc*, to March 1, 2010 [Docket No. 10401]. In support, Paul Hastings submitted the "Affidavit of Robert M. Keane, Jr. in Support of the Application of the Debtors Pursuant to Section 327(e) of the Bankruptcy Code and Rule 2014(a) of the Federal Rules of Bankruptcy Procedure for Authorization to Employ and Retain Paul, Hastings, Janofsky & Walker LLP as Special Counsel to the Debtors, *Nunc Pro Tunc* to March 1, 2010." [Docket No. 10447] (the "Special Counsel Affidavit"). The OCP Affidavits and the Special Counsel Affidavit are collectively referred to herein as the "Affidavits". The Affidavits are incorporated herein by this reference.

6. By order of this Court entered August 10, 2010 [Docket No. 10677], Paul Hastings' retention as special counsel to the Debtors was approved effective as of March 1, 2010.

7. I respectfully submit this affidavit in connection with the Firm's continued services as special counsel to the Debtors. Since filing the Affidavits, certain attorneys have joined the Firm, the Firm has been asked to handle new matters, and the Debtors' counsel has supplemented the list of Interested Parties, thus necessitating additional disclosure.

**New Professionals**

8. In July 2010, Patrick Dennis joined the Firm as an associate in the Firm's San Francisco office in the Corporate Department. Before joining the Firm, Mr. Dennis was an associate at Dechert LLP. While there, he represented Amber Capital in matters involving one or more of the Debtors. The Firm has imposed (and will continue to impose) an ethical wall between Mr. Dennis and the Paul Hastings attorneys representing the Debtors in these chapter 11 cases.

9. In July 2010, Yeon Jin Seong joined the Firm as an associate in the Firm's Hong Kong office in the Corporate Department. Before joining the Firm, Mr. Seong was an associate at Simpson Thacher and before that at Linklaters. While there, Mr. Seong represented one or more of the Debtors in certain transactional matters.

10. In July 2010, Frances Dan Feng joined the Firm as an associate in the Firm's Hong Kong office in the Corporate Department. Before joining the Firm, Ms. Feng was an associate at Linklaters. While there, Ms. Feng represented The Joint Administrators of Lehman European Group Administration Companies in the US in a transactional matter. The Firm has imposed (and will continue to impose) an ethical wall between Ms. Feng and the Paul Hastings attorneys representing the Debtors in these chapter 11 cases.

11. In October 2010, Jessica S. Ryan joined the Firm as an associate in the Firm's New York office in the Corporate Department. Before joining the Firm, Ms. Ryan was an associate at Weil, Gotshal & Manges LLP. While there, she represented one or more of the Debtors in certain transactional matters.

12. In October 2010, Blake R. Bertagna joined the Firm as an associate in the Firm's San Diego office in the Employment Law Department. Before joining the Firm, Mr. Bertagna was a law clerk for the Honorable Robert C. Jones, United States District Court of Nevada. While a law clerk, one of the cases on which Mr. Bertagna worked was "Barfield v. Lehman Brothers." The Firm has imposed (and will continue to impose) an ethical wall between Mr. Bertagna and the Paul Hastings attorneys representing the Debtors in these chapter 11 cases.

13. In November 2010, Jordan K. Baggs joined the Firm as an associate in the Firm's Hong Kong office in the Corporate Department. Before joining the Firm, Mr. Baggs was an associate at Hogan Lovells US LLP ("Hogan"). While at Hogan, Mr. Baggs filed claims against Lehman Brothers Holdings International on behalf of The Bank of New York Mellon, Standard Chartered Bank Plc, and VBS Investment Bank Ltd. The Firm has imposed (and will continue to impose) an ethical wall between Mr. Baggs and the Paul Hastings attorneys representing the Debtors in these chapter 11 cases.

14. In November 2010, Deborah Im joined the Firm as an associate in the Firm's Hong Kong office in the Corporate Department. Before joining the Firm, Ms. Im was an associate at Nishimura & Asahi and before that at Latham & Watkins LLP ("Latham"). While at Latham and before the commencement of the Debtors' chapter 11 cases, Ms. Im represented Alliance Imaging, Inc. and Advanced Micro Devices in certain transactional matters involving one or more of the Debtors. The Firm has imposed (and will continue to impose) an ethical wall

between Ms. Im and the Paul Hastings attorneys representing the Debtors in these chapter 11 cases.

15. In January 2011, Joshua M. Samis joined the Firm as an associate in the Firm's Chicago office in the Corporate Department. Before joining the Firm, Mr. Samis was an associate at Kirkland & Ellis ("K&E"). While at K&E, he represented the following entities in certain transactional matters involving one or more of the Debtors and/or Lehman Brothers Inc. ("LBI"):

Welsh, Carson, Anderson and Stowe  
Local Insight Media, Inc.  
LIM Finance, Inc.  
LIM Finance II, Inc.  
Hawaiian Telecom YP  
Madison Dearborn Partners, Inc.  
CDW Corporation  
GTCR  
Syniverse Technologies, Inc.

The Firm has imposed (and will continue to impose) an ethical wall between Mr. Samis and the Paul Hastings attorneys representing the Debtors in these chapter 11 cases.

16. In January 2011, David Dwyer joined the Firm as an associate in the Firm's Hong Kong office in the Corporate Department. Before joining the Firm, Mr. Dwyer was an associate at Simpson Thacher. While there, he represented LBI and Lehman Brothers Private Equity Partners Limited in certain transactional matters.

17. In February 2011, James Ma will join the Firm as an associate in the Firm's Hong Kong office in the Corporate Department. Before joining the Firm, Mr. Ma was an associate at Schulte Roth & Zabel LLP. While there, he represented Mount Kellett Capital in a transaction involving Lehman Brothers Treasury Co. B.V. and Lehman Brothers Bankhaus AG.

The Firm has imposed (and will continue to impose) an ethical wall between Mr. Ma and the Paul Hastings attorneys representing the Debtors in these chapter 11 cases.

**New Matters**

18. Paul Hastings has in the past represented, currently represents, and may in the future represent Interested Parties in matters unrelated to the matters for which Paul Hastings has been engaged. As indicated in the Affidavits, Paul Hastings has continued to review potential connections between the Firm and known Interested Parties. Based on this continuing review, in addition to the connections described in the Affidavits, I have ascertained that Paul Hastings has a connection with certain Interested Parties as set forth below.

19. Paul Hastings represents, or has represented in the past, in matters unrelated to the Debtors, the following Interested Parties (or their affiliates):

Declan Kelly – Firm client  
Stone Lion Capital Partners LP – Firm client  
BAE Systems – Firm client

Paul Hastings will not represent these parties in the Debtors' chapter 11 cases without the Debtors' written consent, the United States Trustee's approval, and the Court's authorization.

20. In August 2010, certain attorneys in the Firm's Los Angeles office were asked to represent one or more of the Debtors in a loan restructuring and/or foreclosure regarding the On the Avenue Hotel in New York. The borrower is a joint venture led by Highgate Holdings and Rockpoint, which is a Firm client on unrelated matters. The Firm has imposed (and will continue to impose) certain screening procedures in the form of ethical walls between the attorneys, files, and information relating to the Firm's representation of the Debtors and those relating to the Firm's representation of Rockpoint.

21. In September 2010, certain attorneys in the Firm's New York office were asked to represent the European Bank for Reconstruction and Development ("EBRD")

in negotiations regarding two tolling agreements with LBI. The agreements would toll the statute of limitations relating to alleged avoidance actions that LBI may bring against EBRD. The amount at issue is approximately \$175,000. EBRD also requested Paul Hastings' assistance in a potential global settlement involving three claims (aggregating approximately \$90,000) filed by EBRD against LBI and the \$175,000 referenced above. Paul Hastings does not represent LBI or the SIPA trustee. I am informed that this matter is unrelated to the matters for which the Debtors have engaged the Firm.

22. As previously disclosed in the Special Counsel Affidavit, certain attorneys in the Firm's New York office represent CarVal Investors UK Limited ("CarVal") in matters relating to the Debtors' chapter 11 cases. The Firm continues to represent CarVal with respect to issues concerning the Debtors' proposed plan of reorganization. CarVal holds direct and guarantee claims against several of the Debtors, including but not limited to LBHI, Lehman Commercial Paper Inc., and Lehman Brothers International (Europe). This representation continues to be unrelated to the matters on which the Debtors have engaged the Firm. The Firm continues to impose certain screening procedures in the form of ethical walls between the attorneys, files and information relating to the Firm's representation of the Debtors and those relating to the Firm's representation of CarVal in relation to the Debtors.

**Additional Interested Parties**

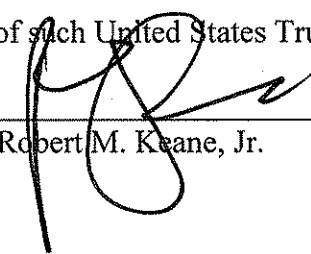
23. The Firm has received a supplemental list of Interested Parties from the Debtors' counsel (the "Additional Interested Parties"). The Firm searched on its electronic database for its connection to the Additional Interested Parties.

24. Based on its conflicts research, the Firm makes the following specific disclosure:

(a) Annexed hereto as Exhibit 1 is a list of Additional Interested Parties (or their affiliates) whom the Firm represents, or has represented in the past, in matters unrelated to the matters on which the Firm is employed; and

(b) Annexed hereto as Exhibit 2 is a list of Additional Interested Parties (or their affiliates) whom the Firm represents, or has represented in the past, in matters related to the Debtors or their affiliates.

25. Based on the foregoing and the Affidavits, and except as provided herein and in the Affidavits, to the best of my knowledge, information, and belief formed after reasonable inquiry, the Firm does not: (a) represent or hold any interest adverse to the Debtors or their estates with respect to the matters on which the Firm seeks to be employed as special counsel; or (b) have any connection with the Debtors, any creditors or other Interested Parties, their respective attorneys and accountants, or the United States Trustee for the Southern District of New York or any person employed by the Office of such United States Trustee.

  
Robert M. Keane, Jr.

SWORN AND SUBSCRIBED before me  
this 31<sup>st</sup> day of January, 2011.

  
Notary Public

My Commission Expires: Dec 13, 2011





**Exhibit 1**

**Additional Interested Parties or Their Affiliates Whom the Firm Represents  
or Has Represented in the Past in Matters Unrelated to  
the Matters on Which the Firm Is Engaged**

**Potential Parties in Interest**

3i Group PLC – Not a client, but is affiliated with certain client entities  
ADM Galleus Fund Limited – Need more information  
Aggregating Trust 1, L.L.C. – Need more information  
Aggregating Trust 10, L.L.C. – Need more information  
Aggregating Trust 2, L.L.C. – Need more information  
Aggregating Trust 3, L.L.C. – Need more information  
Aggregating Trust 4, L.L.C. – Need more information  
Aggregating Trust 5, L.L.C. – Need more information  
Aggregating Trust 6, L.L.C. – Need more information  
Aggregating Trust 7, L.L.C. – Need more information  
Aggregating Trust 8, L.L.C. – Need more information  
Aggregating Trust 9, L.L.C. – Need more information  
Aglia Master Fund Limited – Need more information  
Alansbanken Sverige AB – Need more information  
Altma Fund Sicav PLC, in respect of Rowan Sub-Fund – Need more information  
Anchorage Capital Master Offshore, Ltd. – Need more information; may be affiliated  
with client Anchorage Advisors LLC  
Avignon Capital Ltd. – Need more information  
Aviva Insurance Company – Not a client, but is affiliated with certain client entities  
AXA Wholesale Core Australian Fixed Interest Fund – Not a client, but is affiliated with  
certain client entities  
BY Partners, L.P. – Need more information. If this is BYJ Partners, then a Firm client.  
Banco Espanol de Credito, S.A. – Not a client, but is affiliated with certain client entities  
Banco Urquijo SBP, S.A. – Need more information. If this is Banco Urquijo SA, then  
not a client, but is affiliated with certain client entities.  
Bank of America Mexico, S.A. – Firm client and affiliated with certain client entities  
Bank Sarasin & Co., Ltd. – Not a client, but is affiliated with certain client entities  
Bankers Life and Casualty Company – Not a client, but is affiliated with certain client  
entities  
Baupost Group Securities, L.L.C. – Not a client, but is affiliated with a client entity  
Bayview Financial, L.P. – Client  
Bayview Opportunity Master Fund, L.P. – Not a client, but is affiliated with certain client  
entities  
Bellair Development Group S.A. – Need more information. If this is Belleair  
Development Group, then not a client.  
BHF-Bank Aktiengesellschaft – Not a client, but is affiliated with certain client entities  
Billie Chadwick – Need more information.

Black River Commodity Energy Fund LLC - Need more information. If this is related to Black River Asset Management, then not a client, but affiliated with certain client entities.

Black River Commodity Fund Ltd. - Need more information. If this is related to Black River Asset Management, then not a client, but affiliated with certain client entities.

Black River Convertible Bonds and Derivatives Fund - Need more information. If this is related to Black River Asset Management, then not a client, but affiliated with certain client entities.

Black River Fixed Income Relative Value Fund Ltd. - Need more information. If this is related to Black River Asset Management, then not a client, but affiliated with certain client entities.

Black River Global Equity Fund Ltd. - Need more information. If this is related to Black River Asset Management, then not a client, but affiliated with certain client entities.

Black River Municipal Fund Ltd. - Need more information. If this is related to Black River Asset Management, then not a client, but affiliated with certain client entities.

Blue Bridge Holdings Limited - Need more information. If this is related to Black River Asset Management, then not a client, but affiliated with certain client entities.

BlueBay (Masters) Fund II Limited – Not a client, but is affiliated with certain client entity

BlueBay Asset Management PLC – Firm client

BNP Paribas Sucursal en Espana P.P. – Not a client, but is affiliated with certain client entities

BP Gas Marketing Limited – Not a client, but is affiliated with certain client entities

Brahman Investments I - Need more information. If this is related to Brahman C.P.F. Partners LP, then not a client.

Bridgepoint International Inc. – Need more information. If this is Bridgepoint International Inc., then not a client.

Caisse D'Epargne et de Prevoyance de Midi-Pyrenees – Firm client and affiliated with certain client entities

Canpartners Investments IV, LLC – Firm client and affiliated with certain client entities

Capital One, N.A. – Not a client, but is affiliated with certain client entities

CapStar Copley LLC – Need more information. If this is related to CapStar Hotels, then affiliated with certain client entity.

Carval Investors UK Limited – Firm client and affiliated with certain client entities

Caspian Alpha Long Credit Fund, L.P. – Not a client, but is affiliated with certain client entities

Caspian Capital Partners, L.P. – Not a client, but is affiliated with certain client entities

Caspian Corporate Loan Fund, LLC – Not a client, but is affiliated with certain client entities

Caspian Select Credit Master Fund, Ltd. – Not a client, but is affiliated with certain client entities

CC Arbitrage, Ltd. - Need more information

Cheyne Fund L.P. – Need more information. If this is related to Cheyne Capital Holdings, then not a client.

Cheyne Leverage Fund L.P. – Need more information. If this is related to Cheyne Capital Holdings, then not a client.

Chiba Bank, Ltd. – Firm client

CineMedia LC – Need more information. If this is National CineMedia Inc., then not a client.

Citibank Belgium S.A. – Not a client, but affiliated with certain client entities

Clayton Commercial Corporation – Need more information. If this is related to Clayton Commercial Realty, then not a client.

Conseco Life Insurance Company – Firm client and affiliated with certain client entities

Credican, C.A. - Need more information

Credit Mutuel Arkea – Not a client, but affiliated with certain client entities

Credit Suisse International – Firm client and affiliated with certain client entities

Crescent I, LP - Need more information

CSS, LLC - Need more information

CWABS Asset Backed Certificates Trust 2006-BC2 – Not a client, but is affiliated with certain client entities

CWABS Asset Backed Certificates Trust 2006-SD4 - Not a client, but is affiliated with certain client entities

CWALT, Inc. Alternative Loan Trust 2007-OH2 - Not a client, but is affiliated with certain client entities

Cyrus Capital Partners, L.P. – Firm client

Cyrus Europe Master Fund Ltd. – Not a client, but is affiliated with certain client entity

Cyrus Opportunities Master Fund II, Ltd. – Not a client, but is affiliated with certain client entity

Daiwa Securities Capital Markets Co. Ltd. – Need more information. If this is Daiwa Securities Capital Markets, then not a client, but is affiliated with certain client entities

Davidson Kempner Distressed Opportunities Fund, LP – Not a client, but is affiliated with certain client entities

Davidson Kempner Distressed Opportunities International, Ltd. – Not a client, but is affiliated with certain client entities

Davidson Kempner Institutional Partners, L.P. – Not a client, but is affiliated with certain client entities

Davidson Kempner International, Ltd. – Not a client, but is affiliated with certain client entities

Davidson Kempner Partners – Firm client and is affiliated with certain client entities

Delta Airlines, Inc. – Firm client and is affiliated with certain client entities

Delta Coves Venture, LLC – Need more information

Delta Lloyd Bank NV – Not a client, but is affiliated with certain client entities

Deutsche Bank SA/NV – Not a client, but is affiliated with certain client entities

Dinero Active I Fondo de Inversion - Need more information

Diversified European Credit S.A. – Not a client, but is affiliated with certain client entities

Duquesne Light – Need more information. If this is Duquesne Light Company, then client and affiliated with certain client entities.

DZ Privatbank (Schweiz) AG – Not a client, but is affiliated with certain client entities  
Element Capital Master Fund Limited – Need more information  
Ellington Emerging Markets Fund, Ltd. – Not a client, but is affiliated with certain client entities  
Ellington Overseas Partners, Ltd. – Not a client, but is affiliated with certain client entities  
Emirates National Oil Company – Not a client, but is affiliated with certain client entities  
EPSV Araba Eta Gasteizko Aurrezki Kutxa III – Need more information  
EPSV Araba Eta Gasteizko Aurrezki Kutxa IV – Need more information  
Esca Co., Ltd. – Need more information  
Fairfax Financial Holdings Limited – Not a client, but is affiliated with certain client entities  
Farallon Capital Institutional Partners II, L.P. – Not a client, but is affiliated with certain client entities  
Farallon Capital Institutional Partners III, L.P. – Not a client, but is affiliated with certain client entities  
Farallon Capital Institutional Partners, L.P. – Not a client, but is affiliated with certain client entities  
Farallon Capital Offshore Investors II, Inc. – Not a client, but is affiliated with certain client entities  
Farallon Capital Offshore Investors III, Inc. – Not a client, but is affiliated with certain client entities  
Farallon Capital Partners, L.P. – Not a client, but is affiliated with certain client entities  
FCP Groupama Dynamisme – Need more information. If this is related to Groupama SA, then not a client, but is affiliated with certain client entities.  
FCP Groupama Equilibre – Need more information. If this is related to Groupama SA, then not a client, but is affiliated with certain client entities.  
Fenway Capital, LLC – Need more information. If this is related to Fenway Partners Inc., then not a client, but is affiliated with certain client entities  
Fenway Funding, LLC – Need more information. If this is related to Fenway Partners Inc., then not a client, but is affiliated with certain client entities.  
FH Emerging Markets Debt Fund L.P. – Need more information  
Findomestic Banca S.P.A. – Not a client, but is affiliated with certain client entities  
FKA Countrywide Home Loans Servicing LP – Countrywide Home Loans Servicing LP is not a client, but is affiliated with certain client entities  
Florida State Board of Administration – Firm client and is affiliated with certain client entities  
Fonalava Fondo de Inversion – Need more information  
Fonds Commun De Placement Tait Bout Obligations ET - Need more information  
Futanami Securities Co., Ltd. – Need more information  
Glencore Energy UK Ltd. – Not a client, but is affiliated with certain client entities  
GN3 SIP Ltd. – Not a client, but is affiliated with certain client entities  
GoldenTree European Select Opportunities Master Fund, L.P. – Not a client, but is affiliated with certain client entities

GoldenTree High Yield Master Fund Ltd. – Not a client, but is affiliated with certain client entities.

GoldenTree High Yield Value Fund Offshore (Strategic), Ltd. – Not a client, but is affiliated with certain client entities

GoldTree Master Fund II Ltd. – Not a client, but is affiliated with certain client entities

GoldTree Master Fund Ltd. – Not a client, but is affiliated with certain client entities

Grayson Ventures Limited – Need more information. If this is related to Grayson Investors Corp., then not a client, but is affiliated with certain client entities. If this is related to Grayson Management Inc., then not a client, but is affiliated with certain client entities.

Great Bay Condominium Owners Association - Need more information

Grup Actinver – Need more information. If this is Grupo Actinver, then not a client.

Grupo Financiero Bank of America – Not a client, but is affiliated with certain client entities

Gruss Arbitrage Master Fund, Ltd. – Not a client, but is affiliated with certain client entities

Gruss Global Investors Master Fund (Enhanced), Ltd. – Not a client, but is affiliated with certain client entities

Gulf Stream – Sextant CLO 2006-1 Ltd. – Need more information. If this is related to Gulfstream Asset Management, then not a client.

Hain Capital Holdings, Ltd. – Need more information. If this is related to Hain Capital Group Inc., then not a client.

HBK Master Fund L.P. – Not a client, but is affiliated with certain client entities

Hermes, Ltd. – Need more information.

HFR Ed Select Fund IV Master Trust DTD 7/16/01 – Need more information. If this is related to HFR Asset Management Ltd., then not a client.

Hickok Place, L.L.C. - Need more information

Highland CDO Opportunity Master Fund, L.P. – Not a client, but is affiliated with certain client entities

Highland Credit Opportunities CDO, L.P. – Not a client, but is affiliated with certain client entities

Highland Credit Strategies Fund – Not a client, but is affiliated with certain client entities

Highland Credit Strategies Master Fund, L.P. – Not a client, but is affiliated with certain client entities

Highland Crusader Offshore Partners, L.P. – Not a client, but is affiliated with certain client entities

Highland Floating Rate Advantage Fund – Not a client, but is affiliated with certain client entities

Highland Floating Rate Fund – Not a client, but is affiliated with certain client entities

HSBC Bank (Cayman) Limited, acting as trustee of Sub-Trust (A-H) – Not a client, but is affiliated with certain client entities

HSBC Bank USA, N.A. – Not a client, but is affiliated with certain client entities

HSBC Securities Japan Limited – Not a client, but is affiliated with certain client entities

ICICI Bank UK PLC – Not a client, but is affiliated with certain client entities

Ingram Pension Plan/NY Life Co. TTEE Ingram Industries Retirement Plan – Need more information

Institucion de Banca Multiple – Need more information

Inversiones Y Fabricaciones, SL - Need more information

Investcorp Fixed Income Relative Value – Not a client, but is affiliated with certain client entities

Investcorp Silverback Arbitrage Master Fund Ltd. – Not a client, but is affiliated with certain client entities

Investec Bank (Switzerland) AG – Not a client, but is affiliated with certain client entities

Japan Net Bank, Ltd. – Not a client, but is affiliated with certain client entities

Kawasaki Heaving Industries, Ltd. – Need more information. If this is Kawasaki Heavy Industries Ltd., then Firm client and affiliated with certain client entities.

KC CLO I – Not a client, but is affiliated with certain client entities

KC CLO II – Need more information. If this is KC CLO II Public Ltd Co., then not a client. If this is related to Deutsche Bank AG, then not a client, but is affiliated with certain client entities.

Kempner International, Ltd. – Need more information. If this is related to Davidson Kempner Partners LLC, then not a client, but is affiliated with certain client entities.

King Capital Ltd. – Need more information.

King Street Acquisition Company, LLC – Not a client, but is affiliated with certain client entities

Knight Capital Europe Limited – Not a client, but is affiliated with certain client entities

Korea Central Mortgage, Inc. - Need more information

Landesbank Hessen-Thuringen – Not a client, but is affiliated with certain client entities

LB/L SunCal Northlake, LLC – Not a client, but is affiliated with certain client entities

LB/L-SunCal Oak Valley, LLC – Not a client, but is affiliated with certain client entities

LBNV Holdings, L.L.C. – Need more information

The Lehman Hong Kong Liquidators – Not a client, but is affiliated with certain client entities

Lombarda Vita Socitea per Azioni – Need more information. If this is Lombarda Vita., then not a client.

London Select Fund Limited – Need more information

Loomis Street, L.L.C. – Need more information

Lorimer Corporation – Need more information. If this is H. Lorimer Corporation, then not a client.

Louis Dreyfus Energy Services, L.P. – Not a client, but is affiliated with certain client entities

Louisiana Department of Revenue – Not a client, but State of Louisiana is a client

Luminus Energy Partners Master Fund Ltd. – Need more information

Lyxor/York Fund Limited – Need more information. If this is related to Lyxor Asset Management, then not a client, but is affiliated with certain client entities.

Macquarie Bank Limited – Firm client and affiliated with certain client entities

Marathon Credit Opportunity Master Fund Ltd. – Not a client, but is affiliated with certain client entities

MassMutual Asia Limited – Not a client, but is affiliated with certain client entities

Mayer Brown LLP – Not a client, but is affiliated with certain client entities  
McKenna Long & Aldridge LLP – Firm client  
Menter, Rudin & Trivelpiece, P.C. – Firm client  
Merchantil Commercbank, N.A. – Need more information. If this is Mercantil  
Commercebank, then not a client.  
Merrill Lynch, Pierce, Fenner & Smith Incorporated – Not a client, but is affiliated with  
certain client entities  
Metropolitan Life Insurance Company – Firm client and is affiliated with certain client  
entities  
Michael Ruppert – “Michael J. Rupert” is a Firm client  
Milbank, Tweed, Hadley & McCloy LLP – Firm client  
Mizuho Alternative Investments LLC – Not a client, but is affiliated with certain client  
entities  
Mizuho Bank (Switzerland) Ltd. – Not a client, but is affiliated with certain client entities  
Mizuho Capital Markets Corp. – Not a client, but is affiliated with certain client entities  
Mizuho Securities Co., Ltd. – Not a client, but is affiliated with certain client entities  
Morgan Stanley Capital Services Inc. – Firm client and is affiliated with certain client  
entities  
MTR Corporation Limited – Firm client  
Murata Machinery, Ltd. – Firm client  
Natixis S.A. – Firm client  
Neuberger Berman Management, LLC – Firm client  
Newtonville Partners, L.L.C. – Need more information  
Nexen Energy Marketing Europe Limited – Not a client, but is affiliated with certain  
client entities  
Nexen Energy Marketing London Limited – Not a client, but is affiliated with certain  
client entities  
NML General Fund – Not a client, but is affiliated with certain client entities  
NMLA General Fund (NMLGENCA) [by AllianceBernstein] – Need more information  
Nomura Securities Co. Ltd. – Firm client and affiliated with certain client entities  
Noonday Offshore, Inc. – Not a client, but is affiliated with certain client entities  
NorthStar Real Estate Securities Opportunities Master Fund L.P. – Not a client, but is  
affiliated with certain client entities  
NY State Department of Labor – Not a client, but is affiliated with certain client entities  
Obaxbank S.p.A. – Need more information. If this is Abaxbank SpA, then not a client.  
OBB-Posbus GmbH – Need more information. If this is OBB-Postbus GmbH, then not a  
client.  
Oberoesterreichische Verischerung AG – Need more information. If this is  
Oberoesterreichische Versicherung AG, then not a client.  
OCM Opportunities – Not a client, but is affiliated with certain client entities  
OCM Opportunities VIII Delaware, L.P. – Not a client, but is affiliated with certain client  
entities  
Oesterreichische Elektrizitaetswirtschafts – AG – Not a client, but is affiliated with  
certain client entities

OZ Special Master Fund, Ltd. c/o Och-Ziff Capital Management Group – Not a client, but is affiliated with certain client entities  
Paloma Industries – Not a client, but is affiliated with certain client entities  
Paloma Industries Nogata Plant Ltd. – Not a client, but is affiliated with certain client entities  
Permal York, Ltd. – Not a client, but is affiliated with certain client entities  
PI US Holdings – Not a client, but is affiliated with certain client entities  
Pilot Insurance Company – Not a client, but is affiliated with certain client entities  
PIMCO Bermuda LIBOR Plus Fund – Not a client, but is affiliated with certain client entities  
Plainfield Special Situations Master Fund Limited – Not a client, but is affiliated with certain client entities  
PMA Koryo Fund – Not a client, but is affiliated with certain client entities  
PMA Prospect Fund – Firm client and is affiliated with certain client entities  
PNC Bank, National Association – Firm client and is affiliated with certain client entities  
Pond Credit (Master), L.P. – Need more information  
ProFund Advisors LLC – Firm client  
Providence Equity Partners IV L.P. – Not a client, but is affiliated with certain client entities  
Providence Equity Partners IV-A L.P. – Not a client, but is affiliated with certain client entities  
Quantum Partners Ltd. – Need more information. If this is Quantum Realty Partners, then not a client, but is affiliated with certain client entities. If this is Quantum Energy Partners, then not a client.  
Raiffeisen Centrobank AG – Not a client, but is affiliated with certain client entities  
Raiffeisen Zentralbank Osterreich AG – Not a client, but is affiliated with certain client entities  
RBS Securities Japan Limited – Not a client, but is affiliated with certain client entities  
Rosslyn Investors I, LLC – Need more information  
Rovida Holdings Limited – Need more information  
RR Investment Co. Ltd. – Need more information  
Sabretooth Master Fund, LP– Need more information  
Samsung Life Insurance Co., Ltd. – Firm client and is affiliated with certain client entities  
Santander Asset Management, S.A., S.G.I.I.C. – Not a client, but is affiliated with certain client entities  
Schroder Alternative Solutions – Not a client, but is affiliated with certain client entities  
Scoggin Capital Management II – Firm client and is affiliated with certain client entities  
Scoggin International Fund, Ltd. – Not a client, but is affiliated with certain client entities  
Scoggin Worldwide Fund, Ltd. – Not a client, but is affiliated with certain client entities  
Sea Port Group Securities, LLC – Not a client, but is affiliated with certain client entity  
Security Pacific Capital Leasing Corporation – Not a client, but is affiliated with certain client entities  
SEI Institutional Investment Trust – Enhanced Income Fund – Not a client, but is affiliated with certain client entities



Shamah 2000 Family Trust – Need more information  
Siemens/Convertibles global markets trading as Innovest European – Need more information. If this is related to Siemens AG, then not a client, but is affiliated with certain client entities. If this is related to Innovest, then not a client.  
Siit Extended Duration Fund Liquidating Trust – Need more information  
SK Securities Co., Ltd. – Not a client, but is affiliated with certain client entities  
SMC Credit Opportunities Fund, Ltd. – Need more information.  
Soros Fund Management LLC – Firm client and is affiliated with certain client entities  
Spring Star Corp. – Need more information.  
Strategic Value Special Situations Master Fund LP – Need more information  
Summit Capital Partners, LP – Firm client and is affiliated with certain client entities  
SunCal Heartland, LLC – Not a client, but is affiliated with certain client entities  
SunCal Marblehead, LLC – Not a client, but is affiliated with certain client entities  
SunCal Oak Knoll, LLC – Not a client, but is affiliated with certain client entities  
SunCal PSV, LLC – Not a client, but is affiliated with certain client entities  
SunCal Torrance, LLC – Not a client, but is affiliated with certain client entities  
TCW Absolute Return Credit Fund, L.P. – Not a client, but is affiliated with certain client entities  
The Drake Global Opportunities (Master) Fund, Ltd. – Not a client, but is affiliated with certain client entities  
The Drake Low Volatility Master Fund, Ltd. – Not a client, but is affiliated with certain client entities  
The Drake Offshore Master Fund, Ltd. – Not a client, but is affiliated with certain client entities  
The Governor and the Company of the Bank of Ireland – Not a client, but is affiliated with certain client entities  
The Varde Fund IX, L.P. – Not a client, but is affiliated with certain client entities  
The Varde Fund IX-A, L.P. – Not a client, but is affiliated with certain client entities  
The Varde Fund V-B, L.P. – Not a client, but is affiliated with certain client entities  
The Varde Fund VII-B, L.P. – Not a client, but is affiliated with certain client entities  
The Varde Fund VIII, L.P. – Not a client, but is affiliated with certain client entities  
Thomas Reynolds – “Thomas E. Reynolds” is a Firm client.  
Total Alpha Investment Fund Management Company S.A. – Need more information  
TSO LLC – Need more information  
Tuscon Electric Company – Need more information. If this is Tucson Electric, then not a client, but is affiliated with a client entity.  
Vanguard Fiduciary Trust Company Asset-Backed Securities Trust – Not a client, but is affiliated with a client entity  
Vanguard Fiduciary Trust Company Corporate Bond Trust – Not a client, but is affiliated with a client entity  
Vanguard Fiduciary Trust Company Intermediate-Term Bond Trust – Not a client, but is affiliated with a client entity.  
Vanguard Total Bond Market Index Fund, a series of Vanguard Bond Index Funds – Not a client, but is affiliated with a client entity

Varde Investment Partners (Offshore) Master, L.P. – Not a client, but is affiliated with certain client entities  
Vital Dinero Fondo de Inversion – Need more information  
Vital Pension Garantizado 2012, P.P.I., E.P.S.V. – Need more information  
VR-LW GmbH – Need more information  
Washington National Insurance Company – Not a client, but is affiliated with certain client entities  
Wharton Asian Arbitrage Fund I – Need more information. If this is related to Wharton Investment Associates, then not a client.  
Wharton Asian Special Opportunities Company 1 Ltd. – Need more information. If this is related to Wharton Investment Associates, then not a client.  
Yuanta Commercial Bank – Not a client, but is affiliated with certain client entities  
ZAO KB Citibank – Not a client, but is affiliated with certain client entities

**Principal Investments**

Oceana Cruises, Inc. – If this is Oceania Cruises, then not a client, but may be affiliated with certain client entities.  
Prestige Cruise Holdings Inc. – Not a client, but may be affiliated with certain client entities  
Walton Street Capital – Firm client and affiliated with certain client entities  
Walton Street Real Estate Fund V, L.P. – Not a client, but is affiliated with certain client entities

**Exhibit 2**

**Additional Interested Parties or Their Affiliates Whom the Firm Represents  
or Has Represented in the Past in Matters Related to  
the Debtors or Their Affiliates**

Lehman Re, Ltd. – Not a client, but is affiliated with certain client entities